## **REMARKS**

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

By the foregoing amendment, the title of the present invention has been amended. Claims 22-24 remain pending.

In the Office Action mailed October 10, 2002, the U.S. Patent Office (PTO) objected to the title as being non-descriptive, objected to the drawings based on form PTO-948, rejected claims 22 and 24 under 35 U.S.C. 103(a) as being unpatentable over Goldhaber et al. (U.S.P. No. 5,794,210) in view of O'Neil et al. (U.S.P. No. 5,987,440), and rejected claim 23 under 35 U.S.C. 103(a) as being unpatentable over Goldhaber et al. and O'Neil et al. in further view of Low et al. (U.S.P. 5,420,926).

#### Objection to Title of the Invention

The title of the present invention has been amended. Therefore, it is requested that the objection to the title be withdrawn.

#### **Objection to Drawings**

Formal drawings with correction to all cited informalities will be submitted once the application is in condition for allowance.

## Rejection of claims 22-24 under 35 U.S.C. 103(a)

The rejection of claims 22-24 under 35 USC 103(a) as being obvious over Goldhaber et al. in view of O'Neil et al. is respectfully traversed for at least the following reasons:

Claim 22 recites, among other patentable features, the combining and anonymizing steps being performed independently of any input by the first or second consumer. The PTO asserts that the anonymizing step is performed independently of any inputs from the consumers as cited in col. 13, lines 34-55 of Goldhaber et al. However, the cited section of Goldhaber et al., particularly, col. 13, lines 34-40, teaches that the customer *does provide inputs* as to "whether or

not to make [his or her contact information] available to advertisers" and that the customer "will probably want to make the [his or her] profile available while keeping [his or her] name and address secret." Furthermore, O'Neil et al. does not cure such deficiencies because as cited by the PTO in col. 13, line 65 to col. 14, line 14, the features of the system disclosed in O'Neil et al. are user-driven based on user (consumer) input as well. For instance, in col. 14, lines 1-3, O'Neil et al. discloses that its system is used to search all the E-PIA members to find those *that have* expressed an interest in purchasing a car and create a list of all members meeting the necessary criteria. Such disclosure implies that inputs are required from members.

Claims 23 and 24 are also patentable over the combination of Goldhaber et al. and O'Neil et al. for similar reasons.

## Conclusion

For at least all of the above reasons, it is respectfully submitted that the present invention is neither disclosed nor suggested by the references of record, and the claims now pending patentably distinguish the present invention from the references of record. Accordingly, reconsideration and withdrawal of the outstanding rejections and an issuance of a Notice of Allowance are earnestly solicited.

Attached hereto is a marked-up version of the changes made to the disclosure by the current amendment. The attached page is captioned "Version with markings to show changes made."

Should the Examiner determine that any further action is necessary to place this application into better form, the Examiner is encouraged to telephone the undersigned at the number listed below.

By:

Respectfully submitted,

Registration No. 44,465

Tiep H. Nguyen

Date:  $\frac{4/10/03}{}$ 

KILPATRICK STOCKTON LLP 607 14<sup>th</sup> Street, N.W.

Suite 900

Washington, DC 20005

(202) 508-5800

GTM/THN/T0091.171834/CITI0080-US/WSHLIB.168831.1

## **VERSION WITH MARKINGS TO SHOW CHANGES MADE**

# **IN THE SPECIFICATION:**

Line 1, page 1, the title has been replaced with:

METHOD AND SYSTEM FOR INFORMATION STORAGE